



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 30, 2001

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EDMC

Mr. Clifford Clark
U.S. Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Dear Mr. Clark:

Re: Policy for the Management of Contaminated Soil from Nonremediation Activities
at the Hanford Site

Reference: Letter, from Mr. James E. Rasmussen, U.S. Department of Energy, to Mr. Michael Bussell, U.S. Environmental Protection Agency, and Mr. Michael A. Wilson, Washington State Department of Ecology, "Management of Contaminated Soil from Nonremediation Activities at the Hanford Site," dated July 02, 1996. 44754

The Washington State Department of Ecology (Ecology) has reviewed the referenced letter from Mr. Rasmussen to Messrs. Bussell and Wilson. This letter outlines a practical and workable policy for managing contaminated soil encountered during excavation on the Hanford Site. Where non-remediation activities generating contaminated soils occur within operable units, this policy may be applied only to Ecology-lead Resource and Conservation Recovery Act (RCRA) operable units or waste management areas. Ecology concurs with the policy provided in the letter with the following additional clarifications:

- All soil excavated within a tank farm fenced area must be maintained within that fenced area. For example, when a trench is excavated across SX tank farm, that excavated soil cannot be moved outside the fenced area of the SX tank farm. The intent is to return the soil to the excavation itself; however, if there is a compelling reason not to do so, approval for alternate soil disposition must be received in writing and in advance from the Ecology project manager.
- This policy should also be used to govern the movement of soil during the installation/decommissioning of temporary footings for drilling activities. Since the contaminated soil policy is specifically limited to non-remediation activities, it is not applicable to management of investigation-derived wastes (IDW). IDW soils will be managed under a separate policy currently under development.

Mr. Clifford Clark

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Ecology project managers expect an update of planned excavations and locations will be provided at the monthly Tri-Party Agreement project managers meeting.

When implementing this policy, under no circumstance shall the replacement of soil increase the spread of contamination. If you have any questions regarding this letter, please contact me at (509) 736-3003.

Sincerely,



Brenda L. Becker-Khaleel
Nuclear Waste Program

BB:lkd

cc: Dave Bartus, EPA
Doug Sherwood, EPA
Beth Bilson, USDOE
Bryan Foley, USDOE
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